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February 6, 2002

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FEB - 6 2002

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Revision of Part 15 of the Commission's Rules Regarding Ultra-Wideband Transmission Systems
ET Docket No. 98-153/
***Ex Parte* Communication**

Dear Mr. Caton:

Pursuant to Section 1.1206(b) of the Commission's rules, I am writing on behalf of the Short Range Automotive Radar Frequency Allocation group ("SARA"), an association of automotive and automobile component manufacturers, to notify you of an *ex parte* communication to Chairman Powell from the National Transportation Safety Board in connection with the above-referenced proceeding. The communication was sent to address the use of 24 GHz ultra-wideband ("UWB") radar systems designed to enhance road safety. The communication is attached.

An original and one copy of this letter is submitted for inclusion in the proceeding record.

Respectfully submitted,

Ari Q. Fitzgerald
Counsel for SARA

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Enclosures

National Transportation Safety Board
Washington, D.C. 20594

Office of the Vice Chairman

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February 5, 2002

Honorable Michael K. Powell
Chairman
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: ET Docket 98-153 – Revision of Part 15 of the Commission's Rules Regarding Ultra-Wideband Transmission Systems
Ex Parte Communication

Dear Chairman Powell:

The National Transportation Safety Board is charged by Congress with investigating significant transportation-related accidents that occur in the United States and issuing safety recommendations intended to prevent similar accidents. Since its inception in 1967, the Safety Board has investigated thousands of surface transportation accidents and has issued numerous recommendations for improving safety on the Nation's roadways.

One of the Safety Board's longstanding goals has been to reduce the incidence of automobile collisions. In 1999, more than 6 million collisions occurred on U.S. roadways, killing over 41,000 people and injuring nearly 4.3 million others. Our research has shown that new technologies have a critical role in reducing the number of such collisions. The rapid deployment of technologies that can alert drivers to potential collisions before they occur can save thousands of lives each year.

Last year, the Safety Board adopted a report on the use of and potential benefits of collision warning systems and adaptive cruise control to prevent or reduce the severity of rear-end collisions.[1] We issued recommendations to the Department of Transportation to require rear-end collision warning systems on commercial vehicles and to the National Highway Traffic Safety Administration and automotive manufacturers to develop and implement a program to inform the public and commercial drivers on the benefits, use, and effectiveness of collision warning systems and adaptive cruise control.

[1] National Transportation Safety Board, *Vehicle- and Infrastructure-Based Technology for the Prevention of Rear-End Collisions*, Special Investigation Report NTSB/SIR-01/01 (Washington, DC: NTSB, 2001).

Earlier, in 1995, the Safety Board recommended that the Federal Communications Commission "expedite rulemaking action on the allocation of frequencies that would enhance the development possibilities of collision warning systems." The FCC responded that the frequency bands of 46.7 – 46.9 GHz and 76-77 GHz were allocated for vehicle collision avoidance systems and the recommendation was classified "Closed—Acceptable Action."

Since the issuance of the 1995 recommendation, many advances have been made in collision warning and avoidance system radars and even greater benefit can be realized. Specifically, a consortium of automobile, radio frequency system, and component manufacturers (SARA—Short Range Automotive Radar Frequency Allocation Group) has developed a system that can further detect potential collisions, warn drivers, and mitigate the consequences of collisions, should they occur. However, this system operates at 24 GHz, outside the previous frequency allocations made by the FCC in 1995. SARA believes that this radar would be more robust and cost less than radars that have been developed at the higher frequency of 77 GHz.

As you set priorities for the Commission, I hope that you will consider approving a rule that allows the deployment of automotive radars that support advanced collision warning and avoidance technologies in the very near future, particularly those radars that operate in frequencies that do not interfere with safety-of-life frequencies. Doing so would promote the timely deployment of technology that could help reduce the tragedies that occur daily on the Nation's roadways.

Sincerely,

Carol J. Carmody

Carol J. Carmody
Vice Chairman

c.c.: Commissioner Kathleen Q. Abernathy
Commissioner Michael J. Copps
Commissioner Kevin J. Martin
Ms. Magalie Salas, Secretary